

## Questions and Answers

### **FY 2008 Request for Proposals from Indian Tribes and Intertribal Consortia for Nonpoint Source Management Grants Under Clean Water Act (CWA) Section 319**

The RFP for competitive Section 319 grants in FY 2008 states that:

“EPA will respond to questions from individual applicants regarding threshold eligibility criteria, administrative issues related to the submission of the proposal, and requests for clarification about this announcement. Questions must be submitted in writing and must be received by the EPA Regional contact identified below by January 4, 2008. Written responses will be posted on EPA’s website at <http://www.epa.gov/owow/nps/tribal>.”

The following questions and answers are in response to the above RFP.

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#### **QUESTION 1**

**If I apply for 319 base and competitive grants, and place them in an existing PPG, is the match 5% for 2 years and, do I have to prove hardship? Also, are there base and competitive grant examples?**

#### **ANSWER**

If you want to combine the 319 base and competitive grants into an approved PPG, the match will be 5%. You do not need to prove hardship for this match amount. After two years, the match may be increased up to 10% of the work plan budget (as determined by the EPA Regional Administrator).

Where the stated purpose is to include the section 319 grant in a PPG, a Tribe may prepare a budget and proposal based upon the assumption that EPA will approve the waiver amount for PPGs under 40 CFR 35.536. If a proposed PPG work plan differs significantly from the section 319 work plan approved for funding under this RFP, the Regional Administrator must consult with the National Program Manager (See 40 CFR 35.535). The purpose of this consultation requirement is to address the issue of ensuring that a project which is competitively awarded is implemented once commingled with other grant programs in a PPG. If the Tribe does not or cannot include the section 319 grant as part of an approved PPG, or chooses to withdraw the section 319 grant from their PPG, the Tribe must then meet the 40 percent match requirement (or 10 percent if undue hardship is demonstrated). The Tribe must also provide a new budget with the final grant application based upon the program’s match requirement and the Federal award will be reduced to reflect the budget provided

in the original proposal. The purpose of this requirement is to ensure that all work plan activities for a project which is competitively awarded will be implemented in accordance with the same budget and as described in the original proposal (See Section III.B in RFP).

In terms of referencing existing base and competitive grant proposals, as a matter of policy, EPA does not share base or competitive grant proposals with other tribal applicants. According to our Policy for Competition of Assistance Agreements ([http://intranet.epa.gov/ogd/policy/order/5700\\_5.pdf](http://intranet.epa.gov/ogd/policy/order/5700_5.pdf)), Agency employees may not provide pre-proposal/application assistance that will give particular potential applicants a competitive advantage. EPA staff sharing competitive proposals during a competition would fall under this category.

## **QUESTION 2**

**When are the competitive grants due and can we get some assistance with writing ours from EPA? We have a good outline, but I feel that we may need some assistance from EPA to create a proposal that will stand a better chance of funding.**

## **ANSWER**

The competitive grant proposals are due January 15, 2008. If an applicant chooses to submit a proposal through Grants.gov, the proposals are due at 11:59 p.m EST. If an applicant submits a hard copy of their proposal, it is due to the appropriate EPA Regional contact by 5:00 p.m local time.

EPA staff can offer assistance, as long as it's related to threshold eligibility criteria, administrative issues related to the submission of the proposal, and requests for clarification about the announcement, as is stated in the RFP. If a Tribe has questions, for example, about the evaluation criteria, EPA staff can clarify what a criterion means, or how it's scored, but EPA cannot formally or informally provide helpful hints or recommendations to the Tribe. This kind of assistance would be considered as providing an unfair advantage over other Tribes who did not get this assistance. Outside the RFP period, EPA staff could help a Tribe prioritize projects for the following year's RFP, for example, but any kind of assistance beyond what is stated in the RFP is not allowed during an open competition period.